

# **EXHIBIT EEE**

**From:** Pocha, Madhu <mpocha@omm.com>  
**Sent:** Tuesday, March 19, 2019 4:33 PM  
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**Cc:** Stewart, Geoffrey S.; Bennett, Bruce S.; Rosenblum, Benjamin; Perez, Isel M.; jzakia@whitecase.com; csloane@whitecase.com  
**Subject:** RE: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566

Hi Matt,

Following up on our meet and confer yesterday, we write to confirm again that we do not agree to the date range starting on April 1, 2016. As detailed in our prior correspondence below, we do not see how documents that predate Joint Resolution 188 and Act 106, let alone from a prior administration, are relevant to the issue in the Motion of whether the stay is causing a diminution in the bondholders' collateral. In addition to our concerns with multiple rounds of document collections under an expedited schedule, there is the undue burden of logging potentially thousands of irrelevant privileged documents, especially given Movants' position that categorical privilege logs are inadequate and that Movants intend to challenge all assertions of privilege. Even if you could establish that this discovery is somehow relevant, early direction from the Court concerning relevance would inform the privilege review and should help to minimize wasteful, unnecessary disputes that could arise later in the case schedule. To address the concerns raised on yesterday's call, if you were to file a motion to compel, you may rest assured that we will not use it as a basis to delay the schedule and will make plans to comply with the production and other current case deadlines pending the Court's decision.

Regarding interrogatories and other issues that we discussed, we will get back to you separately.

Best,

Madhu